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January 27, 2023

MEMO ENDORSED

VIA ECF

The Honorable Sidney H. Stein
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Fund Liquidation Holdings LLC, et al. v. Credit Suisse Group AG, et al.*, 15-cv-00871 (SHS)

Dear Judge Stein:

We are counsel for defendant UBS AG ("UBS") in the above-captioned action and write on behalf of UBS and the eight Broker Defendants¹ (collectively, the "Defendants"). Defendants' deadline to file their motion to dismiss the Third Amended Complaint ("TAC"), Dkt. 401, is today. Defendants will file two memoranda of law in support of their motion, both of which contain material from the TAC that the Court authorized Plaintiffs to file under seal. Dkt. 407. Defendants will also file a declaration in support of their motion attaching two exhibits, which are assignment agreements referenced in the TAC, *see* ¶¶ 33, 40, and which were provided to Defendants by Plaintiffs on the condition that Defendants treat them confidentially and not share them publicly.

In order to protect the confidentiality of this material, Defendants respectfully request that the Court allow Defendants to file an unredacted copy of their motion, declaration, and the two exhibits under seal, as well as copies of their motion and declaration bearing limited redactions on the Court's public docket. Plaintiffs consent to this request.

Today, Defendants will file (1) a copy of the motion with proposed redactions on the Court's public docket, and (2) an unredacted copy with the proposed redactions highlighted under seal, in accordance with Rule 5(B) of the Court's Individual Rules.

We appreciate the Court's consideration of this matter.

¹ The "Broker Defendants" are TP ICAP plc, Tullett Prebon Americas Corp., Tullett Prebon (USA) Inc., Tullett Prebon Financial Services LLC, Tullett Prebon (Europe) Limited, Cosmorex AG, Gottex Brokers SA, and Velcor SA.

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Respectfully submitted,

/s/ Jefferson E. Bell

Jefferson E. Bell

cc: All Counsel of Record (via ECF)

The request to seal documents as set forth above is granted.

Dated: New York, New York
February 8, 2023

SO ORDERED:



Sidney H. Stein, U.S.D.J.